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September 22, 2014

Via ECF

Honorable Sandra L. Townes  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Patricia Ranta, et al. V. City of New York, et al.  
\_\_\_\_\_ 14 CV 3794 (SLT)(JMA)

Dear Judge Townes:

I am the recently appointed attorney for Louis Scarcella, a defendant in the above-referenced case. On July 16, 2014, defendants, City of New York and the New York City Police Department ("Municipal Defendants") filed a letter seeking permission to file a motion to dismiss (ECF #4). On July 31, 2014, Your Honor granted the Municipal Defendants' request to move for dismissal. At the initial conference before Magistrate Judge Azrack, a briefing schedule was set for the motion to dismiss. I informed Judge Azrack that Mr. Scarcella would also like to move for dismissal and may join in the Municipal Defendants' motion. Judge Azrack suggested that I write to Your Honor about our intention to also move for dismissal.

Accordingly, for the reasons set forth in the July 16, 2014 letter filed by the Municipal Defendants, on behalf of defendant Louis Scarcella, I respectfully request permission to either file a separate motion to dismiss or join in the Municipal Defendants' motion to dismiss if appropriate. Thank you.

Respectfully,

/s/ Richard E. Signorelli

Richard E. Signorelli